



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION

UNITED STATES OF AMERICA	)	<u><b>UNDER SEAL</b></u>
	)	
v.	)	CRIMINAL NO. 2:18cr <i>62</i>
	)	
DEBRA SIERS-HILL,	)	18 U.S.C. § 175b(c)(1)
	)	Possession of an Unregistered Biological
Defendant.	)	Agent or Toxin
	)	(Count 1)
	)	
	)	18 U.S.C. §§ 922(k) and 924(a)(1)(B)
	)	Possession of Firearm with an Obliterated
	)	Serial Number
	)	(Count 2)
	)	
	)	Forfeiture

INDICTMENT

APRIL 2018 TERM – at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 18, 2016, in the Eastern District of Virginia, the defendant, DEBRA SIERS-HILL, did knowingly possess a biological agent and toxin, that is, ricin, which constituted a select agent for which the defendant had not obtained the registration required by regulations under section 351A(c) of the Public Health Service Act.

(In violation of Title 18, United States Code, Section 175b(c)(1).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 18, 2016, in the Eastern District of Virginia, the defendant, DEBRA SIERS-HILL, knowingly possessed a firearm, that is, a Charter Arms Undercover revolver, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated.

(In violation of Title 18, United States Code, Section 922(k) and 924(a)(1)(B).)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE TO BELIEVE THAT, AND ALLEGES THAT:

1. The defendant, DEBRA SIERS-HILL, if convicted of any of the violations alleged in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition used in or involved in the violation.
2. The defendant, DEBRA SIERS-HILL, if convicted of the violation alleged in Count 1 of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
  - a. Any property, real or personal, which constitutes or is derived from proceeds traceable to the violation; and
  - b. Any biological agent, toxin, or delivery system that is of a type or in a quantity that under the circumstances has no apparent justification for prophylactic, protective or other peaceful purposes.
3. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
4. The property subject to forfeiture includes, but is not limited to:

A Charter Arms Undercover revolver seized from the defendant on March 18, 2016.

(In accordance with Title 18, United States Code, Sections 176, 924(d), 981(a)(1)(C);  
Title 28, United States Code, Section 2461.)

Sealed Pursuant to the  
E-Government Act of 2002

United States v. Debra Siers-Hill  
Criminal No. 2:18cr 62

A TRUE BILL

REDACTED COPY

\_\_\_\_\_  
FOREPERSON

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